

Wesley M. Miller Jr.
Attorney at Law*

P.O. Box 12585
Toledo, OH 43606
*Licensed in Ohio

Tel: 419-508-7892
Fax: 567-312-8703
wes@wesleymillerlaw.com

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Tim Reid, Esq.
Mansour Gavin LPA
1001 Lakeside Ave Suite 1400
Cleveland OH 44114

RE: MTC – Respondeat Superior Topics Pursuant to Civil R. 30(b)(6)

Dear Tim,

This letter identifies the referenced topics for depositions of your clients executive, senior, and operation management staff. The topics may not be all inclusive and as new information becomes available I will supplement.

Executive/Senior Management (responsible for the overall direction)

1. Agreement with the state of Ohio re: NCCC.
2. Formulation and implementation of policies and procedures re: NCCC.
3. Compliance with policies and procedures re: Agreement.
4. Compliance with state and federal laws and regulations re: Agreement.
5. Financial management; budgeting; and accounting re: Agreement.
6. Risk management (assessment and evaluation) re: Agreement, NCCC.
7. Correctional Institution Inspection Committee Reports re: NCCC.

Senior/Operations Management (responsible for the operation of the prison facilities)

1. The 7 topics listed above – as they may apply at this level of management.
2. Reporting and liaison with Ohio Dept. of Rehabilitation and Corrections.
3. Reporting and liaison with NCCC.
4. Application of policies and procedures for staffing and training of medical personnel, and corrections officers.
5. Application of policies and procedures for management and supervision of medical personnel and corrections officers.
6. How a medical emergency is determined.
7. How the use of an alternate level provider is determined.
8. The responsibilities of the Institutional Inspector.

9. The responsibilities of the Health Care Administrator.

10. The responsibilities of the Chief Medical Officer.

Please identify the appropriate management individuals who can provide answers to questions focused on the above topics.

Please contact me if you have questions, concerns, or comments.

I apologize for the delay in providing this information as I was on vacation last week and was unable to prepare it prior to then.

Regards,

Wesley M. Miller Jr.

Cc: P. Horner, A. Houser